

COUNTY OF SAN DIEGO

2014 CONFLICT OF INTEREST CODE
BIENNIAL REVIEW REPLY FORM

COUNTY OF SAN

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Contact Person: Debbie Hollick

Telephone Number: 760.740.6379

CLERK OF THE BOARD
OF SUPERVISORS

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OF SUPERVISORS

Name of Agency: Palomar Health

Mailing Address: 456 E. Grand Ave. #301, Escondido, CA 92025

This agency has reviewed its conflict of interest code and has determined that:

☐ **Amendments are necessary:** (Attach Amended Code)
(Check all that applies)

☐ Include new positions (including consultants) which must be designated

☐ Revise the titles of existing positions

☐ Delete titles of positions that have been abolished

☐ Delete positions that manage public investments

☐ Revise disclosure categories

☒ Other Change from Palomar Pomerado Health to Palomar Health

No amendments are necessary. Our agency's code accurately designates all positions which make or participate in the making of governmental decisions; the disclosure assigned to those positions accurately requires the disclosure of all investments, business positions, interests in real property and sources of income which may foresee-ably be affected materially by the decision made by those designated positions; and the code includes all other provisions required by Government Code Section 87302.

Signature of Chief Executive Officer: [Signature]

Date: 7/28/14

You must complete this report regardless of how recently your code was approved or amended. **Please return this report no later than October 1, 2014 to:**

Clerk of the Board of Supervisors
(Conflict of Interest Code)
1600 Pacific Highway, Room 402
San Diego, CA 92101

Approved and/or authorized by the Board of Supervisors of the County of San Diego	
Meeting Date: <u>12/2/14</u>	Minute Order No. <u>23</u>
By: <u>[Signature]</u>	Date: <u>12/4/14</u>
Deputy Clerk of the Board Supervisors	



**PALOMAR
HEALTH**
SPECIALIZING IN YOU

Policy

Conflict of Interest Code

21800

Official (Rev: 4)

Source:
Administrative
Board of Directors

Applies to Facilities:

Applies to Departments:

TENTH AMENDED AND RESTATED CONFLICT OF INTEREST CODE OF PALOMAR HEALTH

I. PURPOSE:

Pursuant to the Political Reform Act, Government Code Sections 87100 et seq. and its implementing regulations at Title 2 of the California Code of Regulations Sections 18100 et seq. (collectively, the "PRA"), Palomar Health (the "District") hereby adopts the following Conflict of Interest Code (this "Code"). Nothing contained herein is intended to modify or abridge the provisions of the PRA; the provisions of this Code are additional to those found in the PRA and any other applicable laws pertaining to conflicts of interest.

II. DEFINITIONS:

The definitions of the PRA and any amendments thereto are incorporated herein and this Code shall be interpreted in a manner consistent therewith.

III. TEXT / STANDARDS OF PRACTICE:

A. DISCLOSURE CATEGORIES:

All Board members, candidates who have officially declared their intention to stand for election to the Board ("Candidates"), designated employees and any other persons and Officials designated under the PRA must disclose their material financial interests, including completion and submission of a complete Statement of Economic Interests on the form published for this purpose by the Fair Political Practices Commission (FPPC) ("Form 700").

B. STATEMENTS OF ECONOMIC INTERESTS: PLACE OF FILING:

All designated employees required to submit a Statement of economic interests shall file the original with the Chief Executive Officer or designee. The District Chief Executive Officer or designee shall make and retain a copy and forward the original to the San Diego County Board of Supervisors.

C. STATEMENTS OF ECONOMIC INTERESTS: TIME OF FILING:

1. Initial Statements. All designated employees employed by the District on the effective date of this Code as amended, promulgated and approved by the San Diego County Board of Supervisors, shall file Statements within 30 days after the effective date of this Code.

2. Assuming Office Statements. All individuals assuming designated positions after the effective date of this Code shall file Statements within 30 days after assuming the designated positions. During this same 30 day period, and prior to filing such Statements, all such persons shall attend an information session presented by the District which describes the contents and requirements of this Code and discusses the potential disqualifications applicable to the individual at issue.

3. Annual Statements. All designated individuals shall file Statements no later than April 1 of each

year.

4. Leaving Office Statements. Every Official who leaves a designated position shall file a Statement within 30 days after leaving his or her position.

5. Candidate Statements. Every Candidate shall file a Statement of Economic Interests within 10 days after the effective date of his or her candidacy as determined by applicable election laws.

D. INCORPORATION OF FPPC REGULATION §18730:

Palomar Health hereby incorporates FPPC Regulation §18730 by reference.

E. DESIGNATED EMPLOYEES:

As identified by the PRA, "designated employees" are those individuals who make or participate in the making of decisions which may foreseeably have a material effect on financial interests of Palomar Health. These individuals are listed in Attachment 1. This Code shall also apply to Board members and other individuals specified in the PRA for purposes of determining disqualification.

IV. ADDENDUM: ATTACHMENT 1

Designated Employees

The designated employees listed in this Attachment shall disclose economic interests on the Form 700:

1. Board Members
2. CEO
3. CFO
4. General Counsel
5. Compliance Officer
6. District Audit Officer
7. Executive Management Team Members
8. Director, Corporate Supply Chain Services
9. Corporate Controller

V. PUBLICATION HISTORY:

Revision Number	Effective Date	Document Owner at Publication	Version Notes
4 (this version)	06/28/2013	Janine Sarti, Chief Legal Officer	Palomar Health is referred to as PPH or Palomar Pomerado Health. Updating the policy to read Palomar Health
3 (Changes)	03/02/2011	Martha (Marty) Knutson, Corporate Compliance Officer	Incorporate FPPC regulation contents by reference; add designated employees. County of San Diego approved this version of the Conflict of Interest Code on October 19, 2010.
2	08/27/2008	Janine Sarti, Chief Legal Officer	Change in the law

(Changes)

1 02/02/2007

James Neal, Director of Corporate
Integrity

No revision notes for this
document. ECP

(Changes)

VI.

Authorized Signer(s):

(06/28/2013) Janine Sarti, Chief Legal Officer

(06/28/2013) Ted Kleiter, Chairman, Board of Directors

VI. **REFERENCES:**

Reference Type

Title

Notes

*Paper copies of this document may not be current and should not be relied on for official purposes. The
current version is in Lucidoc at .*

[https://www.lucidoc.com/cgi/doc-gw.pl?ref=pphealth:21800\\$4](https://www.lucidoc.com/cgi/doc-gw.pl?ref=pphealth:21800$4)